



**SouthWest
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Date: September 2, 2011

From: John E. Dobson, Facility Manager

To: Gregory D. Cash, P.G.
Senior Engineering Geologist
Chief, South Regulatory Unit

Re. **Time Schedule Order for Nitrate**

Mr. Greg Cash,

Our nitrate limits for the wastewater treatment plant are currently being revised and will need to be set at a reasonable level in order to meet the new tentative permit. The Draft Time Schedule Order utilized sample data up to March 2011 for calculating the interim effluent limit for Nitrate (as N). Recent Certified Laboratory reports indicate that 20mg/L of Nitrate as N ($\text{NO}_3 - \text{N}$) during the summer of August 2011 is the highest result that have been received. Our concern is the limitation during the Time Schedule Order (TSO) based on the minimal data that has been collected so far. The calculation of an interim effluent limitation for Nitrate (as N) should include all of the recent data along with the historical data. We request that the interim effluent limitation for Nitrate (as N) be recalculated using the entire nitrate samples analysis collected to date.

Respectively,

John E. Dobson